



Alaska Trollers Association

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Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
Juneau, AK 98111

RE: **Proposal 115**

Dear Alaska Board of Fisheries Members,

Alaska Trollers Association (ATA) represents over 900 Power Troll permits and as many Hand Troll permits that fish in the grounds throughout Southeast Alaska up to Yakutat. Although trollers have probably the smallest commercial vessels in these waters, we are the highest quality per commercial fish operations - bringing aboard one salmon at a time - and a major economic contributor throughout this region since we are 85% Alaska resident. Troll data at ADFG dates back to 1911 and ATA has been in existence since 1924. There is informal documentation preceding those dates as well.

We have brought forth Proposal 115 for the purpose of aligning our fishery with the terms of the Pacific Salmon Treaty which specifies that the CPUE based Tiers which establish the all gear SEAK Chinook allocation are calculated based on, "Estimated CPUE From the Winter Troll fishery in District 113 During statistical weeks 41- 48" (2019 PST Agreement, Appendix B to Annex IV, Chapter 3 pg.72). The Treaty language requires an opening in Week 41. ADF&G opens the Winter Troll fishery on October 11. **In the 2001-2020 Baseline, Oct 11 often falls in Week 42, not in Week 41.**

The 2001-2020 CPUE Week 41-48 Model Baseline has an inconsistent number of fishing days. With a starting date of October 11th the number of fishing days varies from 46 to 53 (See Table). Proposal 115 suggests a slightly longer fishing period (max 9 additional days, 10 possible on leap years) but provides a consistent 56 days annually. This standardizing will "smooth out" the consistency of the Baseline providing better data.

There are many variables that can affect the accuracy of the CPUE Model: participation changes based on tides, weather, and the price of fuel and fish and more. This proposal takes the number of days as a variable out of the equation. **During 2001-2020 the Winter Troll season opened 8 times in Week 42, not in Week 41 as agreed to in the Pacific Salmon Treaty.**

Proposal 115 allows for a few more fishing days at a time **when Stocks of Concern (SOC) are not an issue.** Under SOC management the troll fishery has lost 6 weeks of valuable winter harvest in March and April. In May and June Trollers lost lucrative hatchery access areas because of SOC. Higher winter

prices maximize the value of the Chinook resource. This Proposal restores a small part of the loss without causing gear group conflicts or threatening SOC.

Note the chart below:

Fishing year (Chinook accounting year)	SEAK CPUE	CPUE Quota Red=over Post Quota. Blue=under	Post season AI	Post quota	October 11 fell on Day and Week	Current ADF&G October 11 opening: Days fished Week 41- 48	Proposal 115: Days fished Week 41-48
2001	8.3	266,600	1.29	250,300	Wed, 42	46 least	56
2002	16.9	334,500	1.82	334,500	Thurs, 41	52	56
2003	20.4	334,500	2.17	334,500	Fri, 41	51	56
2004	8.0	266,600	2.06	334,500	Sat, 41	50	56
2005	8.3	266,600	1.9	334,500	Mon, 42	48	56
2006	10.3	334,500	1.73	266,600	Tue, 42	47	56
2007	3.4	140,300	1.34	205,200	Wed, 41	53	56
2008	2.3	111,833	1.01	140,300	Thurs, 41	52	56
2009	3.4	140,323	1.2	140,300	Sat, 41	50	56
2010	4.3	205,165	1.31	205,200	Sun, 42	49	56
2011	6.1	266,585	1.62	266,600	Mon, 42	48	56
2012	4.7	205,200	1.24	205,200	Tues, 42	47	56
2013	4.4	205,200	1.63	266,600	Thurs, 41	52	56
2014	7.4	266,600	2.2	372,900	Fri, 41	51	56
2015	13.2	334,500	1.95	334,500	Sat, 41	50	56
2016	11.05	334,500	2.06	334,500	Sun, 42	49	56
2017	4.18	205,500	1.31	205,200	Tues, 42	47	56
2018	3.58	140,323	0.92	111,833	Wed, 41	53 most	56
2019	3.38	140,323	1.04	111,833	Thurs, 41	52	56
2020	4.83	205,165	1.39	205,165	Fri, 41	51	56

In conclusion, Proposal 115 conforms to the language of the PST - An Oct 11th opening does not.

Your consideration of this proposal is appreciated.

Sincerely,



Amy Daugherty
Executive Director